

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

J.G.,	:	
	:	
Plaintiff,	:	
	:	CIVIL ACTION FILE
vs.	:	
	:	NO. 1:20-cv-05233-SEG
NORTHBROOK INDUSTRIES,	:	
INC., D/B/A UNITED INN AND	:	
SUITES,	:	CONSENT MOTION
	:	
Defendant.	:	

**PLAINTIFF’S CONSENT MOTION TO EXTEND THE DEADLINE FOR
PLAINTIFF TO FILE A RESPONSE TO NORTHFIELD INSURANCE
COMPANY’S MOTION TO INTERVENE TO SUBMIT SPECIAL
INTERROGATORIES AT TRIAL**

COMES NOW, Plaintiff J.G., and hereby moves, with consent of Defendant, Northbrook Industries, Inc. d/b/a United Inn and Suites (“Defendant”), and Non-Party Northfield Insurance Company (“Northfield”) to extend the deadline for Plaintiff to Respond to Northfield’s Motion to Intervene to Submit Special Interrogatories at Trial (Doc. 147) up and through January 6, 2025. In support, Plaintiff states the following:

1.

On December 9, 2024, Northfield filed a Motion to Intervene to Submit Special Interrogatories at Trial in the instant case (*i.e.*, No. 1:20-cv-05233-SEG). (Doc. 147). Northfield is not a party in the instant case.

2.

The current deadline for Plaintiff to file a response brief to Northfield's Motion to Intervene to Submit Special Interrogatories at Trial is December 23, 2024.

3.

Plaintiff requests a fourteen-day extension of time to prepare and file a response brief to Northfield's foregoing motion because of holiday-related travel and conflicts, as well as the press of other matters that Plaintiff's counsel is handling. Granting the requested fourteen-day extension will provide Plaintiff's counsel with adequate time to prepare the response brief.

4.

Counsel for Defendant, and for Northfield, have consented to an extension of the deadline for Plaintiff to file her response brief to Northfield's Motion to Intervene to Submit Special Interrogatories at Trial to January 6, 2025.

5.

This is the first extension Plaintiff has requested to prepare and file a response brief to the Motion to Intervene to Submit Special Interrogatories at Trial, and, therefore, Plaintiff respectfully requests that the Court grant the instant consent motion. The text of a proposed Consent Order is attached hereto as "Exhibit A".

WHEREFORE, Plaintiff respectfully requests that this Court grant her Consent Motion to Extend the Deadline for Plaintiff to File a Response to Northfield's Motion to Intervene to Submit Special Interrogatories at Trial for the reasons set forth above.

Respectfully submitted this 18th day of December, 2024.

/s/ David H. Bouchard

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CERTIFICATE OF COMPLIANCE

This is to certify that the foregoing **Plaintiff's Consent Motion to Extend the Deadline for Plaintiff to File a Response to Northfield Insurance Company's Motion to Intervene to Submit Special Interrogatories at Trial** has been prepared with a font and point selection approved by the Court in LR 5.1., NDGA. Specifically, the above-mentioned pleading was prepared using Times New Roman font of 14-point size.

Respectfully submitted,

/s/ David H. Bouchard

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certify that Plaintiff, through her attorneys, has served a true and correct copy of the foregoing Motion into this District's ECF System, which will automatically forward a copy to counsel of record in this matter.

Dated: This 18th day of December, 2024.

/s/ David H. Bouchard

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